



REMEDIAL OBJECTIVES REPORT AND REMEDIAL ACTION PLAN

CMC PROPERTY
FREEPORT, ILLINOIS

COPY

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1.0 INTRODUCTION

This combined Remedial Objective Report (ROR) and Remedial Action Plan (RAP) comes in response to the approval of the Work Plan, Partial Site Investigation Report, and Partial Remedial Action Plan by the Illinois Environmental Protection Agency (IEPA). The approval by IEPA included several comments, and subsequent telephone conversations with Mr. Jim Mergen, IEPA Project Manager for the CMC Properties Site, which prompted more comments that are addressed in this report. Based on the findings of the investigative activities and IEPA comments, four (4) exposure routes were found to exceed the applicable Tier 1 Remediation Objectives. The exposure routes that require evaluation are the *Groundwater Ingestion Exposure Route*, *Soil Inhalation Exposure Route*, *Soil Ingestion Exposure Route*, and the *Soil Component of the Groundwater Ingestion Exposure Route*. The report is written to address the portion of the CMC Properties Remediation Site, that is located on the northwest side of the Remediation site near the former railroad line. To the north of railroad grade, there is an adjacent oxbow that historically had fill/waste deposited on the east bank of the oxbow, which is also the west side of the former railroad grade. The Site Location Map (Figure 1) shows the location of the fill area.

2.0 CONTAMINANT SOURCE AND FREE PRODUCT DETERMINATION

Before contaminated soil can be left in place at a site by exclusion of an exposure route or due to a Tier 2 Remediation Objective, certain requirements must be met under 35 IAC 742.305. This section of the report addresses each criteria as it applies to the portion of the CMC remediation site that is contaminated with Copper, Lead, Manganese, Nickel, and Zinc.

2.1 Soil Attenuation Capacity

In conducting a Tier 2 evaluation or excluding an exposure pathway, the soil concentration of the organic contaminants of concern cannot exceed the attenuation capacity of the site soils. In this case, the contaminants of concern are inorganic, and, therefore, the organic content does not apply and nothing more is being presented regarding the natural attenuation capacity of the soil relative to the contaminants of concern.

2.2 Soil Saturation Limit

As with the soil attenuation capacity discussed previously, the soil saturation limit for any organic contaminants also needs to be evaluated. For this portion of the CMC site, organic contaminants are not of concern, therefore, the soil saturation limit is not applicable.

2.3 Reactivity

The contaminants of concern are not known to be reactive and, therefore, are not of concern.

2.4 Soil pH

In an effort to satisfy the requirements of 35 IAC 742.305 (d), that requires the soil pH to be between 2.0 and 12.5, the soil sample collected as part of the original Phase II Environmental Site Assessment were tested by the laboratory for pH. All the tested samples yielded a soil pH between 2.0 and 12.5. The pH results are included in Table 1.

2.5 Toxicity

The requirement of 35 IAC 742.305(e) states that soil cannot exhibit the characteristic of toxicity under 35 IAC 721.124 for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, or Silver. There has to be a detectable level of contaminant before toxicity would be applicable. For this site, Lead was found at a level above a remediation objective. Therefore, a representative soil sample from S-2 was collected and tested for Synthetic Precipitation Leaching Procedure (SPLP) and Toxicity Characteristic Leaching Procedure (TCLP) for Lead. The SPLP and TCLP Lead results are presented in Table 1. The TCLP level was found to be 10 mg/L which is over the 5 mg/L criteria for waste disposal purposes. However, the SPLP result of 0.79 mg/L is much lower and much more applicable to a monofill scenario subject to possible infiltrating precipitation. Because the SPLP result is markedly lower than the TCLP result, and also a more applicable test, we believe requirements of 35 IAC 742.305(e) have been met. Any soil removed from the site would be handled as a waste based on the TCLP result, but for the purpose of address toxicity of the soil in place at the Remediation Site, we believe the SPLP result is a better suited analysis.

3.0 SUPPLEMENTAL INFORMATION

As stated in the Work Plan, the IEPA Office of Site Evaluation was to assist the City with an XRF survey and an EM Survey. The EM survey has been conducted and the intent was to identify possible buried underground storage tanks. The EM Survey results are not relevant to the Lead contaminated area and are not discussed further in this report.

3.1 XRF Screening

The XRF survey was conducted over the entire site, with particular attention given to the proposed location of the recreational path. The location of the XRF screening locations are presented in Figure 2 and the results are presented in Table 2. The initial XRF screening was conducted on April 12, 2005, and additional XRF screening was conducted on June 21, 2005. The second round of the XRF screening was conducted to better define the limits of the inorganic contamination. The most important part of the additional screening was to determine if the sediments in the oxbow indicated that Lead contamination has migrated from the fill area to the oxbow itself. The results indicate that the sediment in the oxbow has not been impacted.

3.2 Confirmation Sampling

Based on the results of the XRF screening, a confirmation sample, S-2, was collected to have analyzed at a laboratory. The sample was tested for total metals, SPLP, and TCLP which are tabulated in Table 1. Additionally, the sample was tested for PNA's and the PNA results are included in Table 3. The laboratory report is included in Appendix A. The S-2 location corresponds to the highest XRF screening location and is considered to be the maximum contaminant level on the site. Based on the XRF screening, the level of Lead are highly variable. The XRF screening and the laboratory confirmation results suggest that an area of approximately 1.2 acres maybe impacted. The thickness of the fill area is also variable due to the nature of how the material was placed. Based on geomorphological features, it appears the bank of the oxbow was filled over a period of time by dump truck. The hummocky surface features support this

hypothesis. Without detailed topographic mapping coupled with cross-section test trenches, an accurate determination of the volume of material cannot be made. Based on the work to date, it appears that approximately 30,000 cubic yards of fill may exist along the eastern bank of the oxbow. Depending on the density of the material, this equates to 42,000 to 54,000 tons of material.

3.3 Hydrogeologic Information

As part of the original Phase II Environmental Site Assessment, slug tests were conducted to measure the hydraulic conductivity of the saturated soils at the site. Water levels were also collected so that groundwater flow direction and gradient of the water table could be determined. The slug test results are included in Appendix B. The Groundwater Potentiometric Surface Maps are included in Figures 3a and 3b. The hydraulic conductivity and hydraulic gradient are two (2) key input parameters for the R26 modeling equation.

4.0 LAND USE

The site is currently an abandoned industrial site. The future use is planned to be a recreational path. As a result, the entire site is being investigated as if the use will be recreational. This requires the site specific calculation of remediation objectives that match the planned recreational end use of remedial action that severs the exposure route. The area is currently zoned M-3, which is for heavy industrial use. Once the recreational trail has been built, the site will likely be re-zoned to a recreational use zoning.

5.0 REMEDIAL OBJECTIVES DETERMINATIONS

5.1 Groundwater Ingestion Exposure Route

Based on reviewing the original sampling data from monitoring wells MW-3 and MW-4, it appears that the groundwater is impacted above Tier 1 Remediation Objectives for Iron, Lead, and Manganese. At this Remediation Site groundwater and surface water is of concern. The R26 equation was used to model the lateral extent of the Iron, Lead, and Manganese in groundwater.

5.1.1 Groundwater

The R26 equation was used to model the extent of the groundwater contamination for Iron, Lead, and Manganese from the MW-3 and MW-4 locations. The results of the calculation are located in Appendix C. Table 5 summarizes the calculated distances from the MW-3 and MW-4. Figure 4 shows the calculated distances plotted on the site relative to the Remediation Site Boundary and the City Corporate Boundary. The City Corporate Boundary is also the boundary of the approved Groundwater Use Ordinance. The modeled groundwater plumes extend beyond the Remediation Site Boundary, but are within the boundary of the Freeport Groundwater Use Ordinance boundary. As a result, the groundwater contamination will be addressed by invoking the Groundwater Use Ordinance and the Memorandum of Understanding (MOU) between the IESA and the City of Freeport.

5.1.2. Surface Water

Based on the work discussed in the previous section, the Pecatonica River could be impacted. To verify the modeled groundwater impact, two (2) additional groundwater monitoring wells are proposed to be installed. If the wells are found to be impacted, we propose to use hybrid poplar trees to create a Phyto-Buffer along the portion of the site near the river. Details on the Phyto-Buffer will be presented later in this report. If the wells are not found to be impacted, then confirmation samples will be collected from MW-3 and MW-4 to provide sample confirmation of the original analysis.

5.2 Soil Exposure Routes

In the fill area, the contaminants of concern that were found to exceed the Tier 1 Remediation Objectives included Copper, Lead, Manganese, Nickel and Zinc. Table 6 summarizes which exposure routes for the COC exceed the Tier 1 Remediation Objectives.

5.2.1. Ingestion Exposure Route

All five (5) COCs were found to exceed the Tier 1 Remediation Objectives for the *Soil Ingestion Exposure Route*. Of the COCs, Lead has the lowest RO for the Residential and Commercial/Industrial scenarios. The surface levels of Lead are high enough that attempting to calculate Tier 3 Remediation Objectives based on user scenarios of Picnickers and Groundskeepers was not attempted. Removal of the exposure route is proposed by use of an engineer barrier. Details of the proposed engineered barrier will be provided in Section 6.0 of this report.

5.2.2. *Inhalation Exposure Route*

Manganese was found to exceed the Residential Tier 1 Remediation Objective for the Inhalation Exposure Route. The proposed engineered barrier that will address the *Ingestion Exposure Route* will also be used to address the Manganese that exceeds the *Inhalation Exposure Route*.

5.2.3. *Soil Component to the Groundwater Ingestion Exposure Route*

The Lead Tier 1 Remediation Objective for *Soil Component to the Groundwater Ingestion Exposure Route* has been exceeded. The Lead will be addressed with a clay cap engineered barrier. Details of the engineered barrier are presented in the next section of this report.

6.0 PROPOSED REMEDIAL ACTION

Based on the evaluation of the analytical results for the groundwater and soil against the Tier 1 Remediation Objectives, it appears that the exposure routes could be excluded by use of the City of Freeport Groundwater Use Ordinance, a Phyto-Buffer and an engineered barrier.

6.1 Confirmation Sampling

The groundwater modeling was conducted using data from the original investigative activities. Before initiating any groundwater related remedial activities, we proposed to sample MW-3 and MW-4 to confirm the levels of the levels of Lead and Manganese.

6.2 Selected Remedial Technologies

We have selected remedial technologies that will address the soil and groundwater contamination at the Remediation Site.

6.2.1 *Groundwater Use Ordinance*

To address the Groundwater Ingestion Exposure Route, we propose to invoke to the IEPA approved City of Freeport Groundwater Use Ordinance. A copy of the Ordinance is included in Appendix D. Figure 5 shows the boundary of the Groundwater Use Ordinance relative to the Remediation Site, the site boundary, and the modeled groundwater contamination plumes. As shown on Figure 5, the modeled groundwater plumes do not extend beyond the limits for the Groundwater Use Ordinance Boundary.

6.2.2 *Phyto-Buffer*

If the confirmation sampling reveals that the groundwater adjacent to the Pecatonica River is impacted with the contaminants of concern, then a Phyto-Buffer will be created by planting hybrid poplar trees along the riverfront portion of the Remediation Site. Figure 6 shows the location of proposed the Phyto-Buffer. A Phyto-Buffer as it is termed here falls under the larger category of Phytoremediation. Phytoremediation is the use of plants to partially or substantially remediate contaminants in the soil and/or groundwater. There are four (4) basic processes that may occur as part of Phytoremediation that can lead to contaminant degradation, removal, or immobilization:

1. Degradation (for destroying or altering organic contaminants)
 - Rhizodegradation – biodegradation enhanced by increased microbial activity in the root zone
 - Phytodegradation – uptake of contaminant in the root system and metabolism of the contaminant by the plant.
2. Accumulation (for containing or removing organics and/or metals)
 - Phytoextraction – contaminant uptake and accumulation in the plant for removal
 - Rhizofiltration – contaminants adsorb to roots for containment and/or removal
3. Dissipation (for removing organics and/or inorganics into the atmosphere)
 - Phytovolatilization – uptake and volatilization of contaminants
4. Immobilization (for containing organic and/or inorganic contaminants)
 - Hydraulic Control – control of shallow groundwater by water uptake
 - Phytostabilization – contaminant immobilization in the soil

In this case, the contaminants of concern are metals. The Phyto-Buffer will be used to provide hydraulic control of the local shallow groundwater near the river and the immobilization of the lead in the root zone. A buffer of hybrid poplar trees would be planted along the bank of the Pecatonica River on the far west side of the Remediation Site. Once established, the trees will draw water down at the buffer area. The draw down of the water table will be from both sides of the buffer. As result the drawn-down would prevent water on the up-gradient side of the buffer to migrate through the buffer and reach the river.

The root zone of the buffer can also cause the soluble lead to become insoluble by oxidizing to lead phosphate. The root zone can also cause no biological process to occur such as sorption, ion exchange, and specific adsorption.

6.2.3 Engineered Barrier

The area that will have an engineered barrier placed over it is shown on Figure 7. The impacted area that will require the engineered barrier is approximately 80,000 square feet in extent. The entire Remediation Site is in the floodway of the Pecatonica River. As a result, a Joint Application to the US Army Corp of Engineers, IEPA Division of Water, and the Illinois Department of Natural Resources will have to be prepared and submitted. It is already known that filling in a floodway will not be allowed by IDNR, which means the clay cap cannot be placed on the existing Lead impacted area because it would increase the elevation of the ground surface. Increasing the elevation of the ground surface by filling in a floodway is prohibited, so it is proposed to remove approximately two (2) feet of material from the impacted area to allow for the placement of the same thickness of a clay soil cap. The upper two (2) feet of material will be impacted with Lead. It is proposed to screen the material to remove the glass, metal, and rock debris from the material and the screened out materials will be landfilled and/or recycled. The remaining material will be profiled for waste disposal purposes. If the TCLP Lead is found to exceed the toxicity level of 5 mg/L under RCRA, then the material will be stabilized on-site using flyash and/or Portland Cement. A pilot test of various amounts of fly ash and Portland Cement will be mixed with the material. Samples of the various mixtures will then be tested for TCLP Lead to determine the

proper amount and type of stabilization additive that could be mixed to the entire waste stream to make the waste non-hazardous. The stabilized materials will then be trucked from the site for disposal at a permitted landfill as Special Waste.

7.0 CONCLUSION AND RECOMMENDATIONS

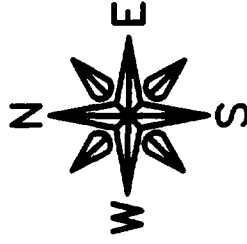
Based on the additional information gathered as part of this report and the evaluation of the existing and new information, the following are proposed to address the contamination associated with this remediation site:

- City of Freeport Groundwater Use Ordinance / Memorandum of Understanding
- Use of an engineered barrier with annual inspection and maintenance
- Phyto-Buffer

Use of the above addresses all of the contaminants and exposure routes that have been evaluated at the remediation site. A Draft No Further Remediation letter is requested for this remediation site.

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FIG



SCALE: 1" = 300'

DRAWING:

FIGURE 1
SITE LOCATION MAP

EGLPT/03/43494/43494-screening_recover, FIGURE 1

JOB NUMBER:

43494

SHEET NUMBER:

1 of 8



= 150'

	BY

DRAWING:

FIGURE 2
XRF SCREENING LOCATIONS MAP

EGLPT/05/45399/43494-LOCATION, FIGURE 2

JOB NUMBER:

45399

SHEET NUMBER:

2 of 8



= 150'

BY	

DRAWING:

FIGURE 3a
GROUND WATER POTENTIOMETRIC
SURFACE- MAY 15, 2003

EGLPT/03/43494/43494-screening_recover, FIGURE 3A

JOB NUMBER:

43494

SHEET NUMBER:

3 of 8



= 150'

	BY

DRAWING:

FIGURE 3b
GROUND WATER POTENTIOMETRIC
SURFACE- JUNE 10, 2003

EGLPT/03/43494/43494-screening_recover, FIGURE 3B

JOB NUMBER:

43494

SHEET NUMBER:

4 of 8



= 150'

	BY

DRAWING:

FIGURE 4
MODELED GROUND WATER PLUMES

EGLPT/03/43494/43494--screening_recover, FIGURE 4

JOB NUMBER:

43494

SHEET NUMBER:

5 of 8



= 150'

	BY

DRAWING:

FIGURE 5
GROUND WATER USE ORDINANCE

EGLPT/03/43494/43494-screening_recover, FIGURE 5

JOB NUMBER:

43494

SHEET NUMBER:

6 of 8

= 150'

FIGURE 6
PHYTO - BUFFER LOCATION MAP

EGLPT/03/43494/43494-screening_recover, FIGURE 6

43494

7 of 8



= 150'

BY	

DRAWING:

FIGURE 7
ENGINEERED BARRIER MAP

EGLPT/03/43494/43494--screening_recover, FIGURE 7

JOB NUMBER:

43494

SHEET NUMBER:

8 of 8

ES

Table 1
Soil Analytical Results
Inorganic Compounds
CMC Property
Freeport, Illinois

Sample Number:		Sample Location:		Units:		Date Sampled:		Time Sampled:		Sample Depth:	
ME00A0	B19A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	10:25	11:05	12:10	12 ft.	16 ft.
ME00A1	B2A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	11:05	11:10	12:10	12 ft.	19 ft.
ME00A2	B2B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	11:10	12:10	12:10	14 ft.	14 ft.
ME00A4	B3B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	12:10	12:35	13:40	3 ft.	3 ft.
ME00A5	B5A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	13:40	16:00	16:10	10-12 ft.	10-12 ft.
ME00A6	B6A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	16:10	16:35	16:40	0-2 ft.	0-2 ft.
ME00A7	B7A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	16:10	16:35	16:40	0-2 ft.	0-2 ft.
ME00A8	B4A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	16:10	16:35	16:40	0-2 ft.	0-2 ft.
ME00A9	B4B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	16:10	16:35	16:40	0-2 ft.	0-2 ft.
ME00B0	B9A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	16:35	16:40	17:00	16-20 ft.	16-20 ft.
ME00B1	B9B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	17:00	17:05	17:25	10-15	10-15
ME00B2	B8A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	17:00	17:05	17:25	10-15	10-15
ME00B3	B8B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	17:00	17:05	17:25	10-15	10-15
ME00B4	B10B	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	17:00	17:05	17:25	10-15	10-15
ME00B6	B10A	Soil	mg/kg	mg/kg	mg/kg	04/29/2003	17:00	17:05	17:25	10-15	10-15
ME00B7	B11A	Soil	mg/kg	mg/kg	mg/kg	04/30/2003	10:15	10:15	10:15	2-3 ft.	2-3 ft.

Exposure Route-specific Values for Soils		Soil Component of the Groundwater Ingestion Exposure Route Values		ADL	
Ingestion (mg/kg)	Inhalation (mg/kg)	Class I (mg/L)	Class II (mg/L)	(mg/kg)	
ALUMINUM (8.200)	---	---	---	---	7
ANTIMONY (3.3)	---	0.006	0.024	0.56	U
ARSENIC (1.3)	750	29	120	5.4	U
BARIUM (122)	5500	690.000	2.0	77.0	U
BERYLLIUM (0.56)	160	1.300	0.004	0.40	U
CADMIUM (0.50)	78	1.800	0.005	0.19	U
CALCIUM (5.525)	---	---	---	---	---
CHROMIUM (13.0)	230	270	0.1	12.1	U
COBALT (8.9)	4700	---	1.0	5.5	U
COPPER (12.0)	2800	---	0.65	11.2	U
IRON (15.000)	---	---	5.0	14.00	U
LEAD (20.9)	400	0.0075	0.1	10.5	U
MANGANESE (630)	3,700	69.000	0.15	42.1	U
MERCURY (0.05)	23	10	0.002	0.050	U
NICKEL (13.0)	1,600	13.000	0.1	14.4	U
POTASSIUM (1.100)	---	---	---	---	---
SILVER (0.37)	390	---	0.05	0.52	U
SODIUM (1.30)	---	---	---	---	---
THALLIUM (0.4)	6.3	---	0.002	0.06	U
VANADIUM (25.0)	590	---	0.049	24.2	U
ZINC (80.2)	23,000	---	5.0	33.6	U
CYANIDE (0.50)	1600	---	---	0.090	U

Table 1
Oil Analytical Results
Organic Compounds
CMC Property
Freeport, Illinois

ANALYTE (Background mg/kg)	Exposure Route-specific Values for Soils		Soil Component of the Groundwater Ingestion Exposure Route Values		Sample Number:		Sampling Location:		Matrix:	Date Sampled:	Time Sampled:	Sample Depth:																																																																																																																																																																																																																																																																																																																																																																																																																																																																
	Ingestion (mg/kg)	Inhalation (mg/kg)	Class I (mg/L)	Class II (mg/L)	ADI (mg/kg)	Result	Flag	Result					Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result

Table 2
XRF Screening Results
CMC Property
Freeport, Illinois

[illegible]

Table 2
XRF Screening Results
CMC Property
Freeport, Illinois

Sampling Location :		XRF-17	XRF-18	XRF-19	XRF-20	XRF-21	XRF-22	XRF-23	XRF-24	XRF-25	XRF-26	XRF-27	XRF-28	XRF-29	XRF-30	XRF-31	XRF-32
Matrix :	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Unit :	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Date Sampled :	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005
Time Sampled :	11:15	11:17	11:19	11:23	11:34	11:36	11:38	11:41	11:43	11:46	11:48	11:50	11:53	11:55	11:57	12:00	
Exposure Route-specific Values for Soils																	
ANALYTE (Background mg/kg)	Ingestion (mg/kg)	Inhalation (mg/kg)	ADL (mg/kg)	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
ALUMINUM (8,200)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
ANTIMONY (3.3)	31	---	*	NS		NS		NS		NS		NS		NS		NS	
ARSENIC (11.3)	---	750	*	LOD	<	LOD	<	LOD	<	44.2		NS		NS		NS	
BARIUM (172)	5500	690,000	*	NS		NS		NS		72.1		LOD	<	LOD	<	LOD	<
BERYLLIUM (0.56)	160	1,300	*	NS		NS		NS		NS		NS		NS		NS	
CADMIUM (0.50)	78	1,800	*	NS		NS		NS		NS		NS		NS		NS	
CALCIUM (5,525)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
CHROMIUM (13.0)	230	270	*	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
COBALT (8.9)	4700	---	---	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
COPPER (12.0)	2800	---	*	LOD	<	LOD	<	LOD	<	113		LOD	<	LOD	<	LOD	<
IRON (115,000)	---	---	---	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
LEAD (20.9)	400	---	*	50.8		85.7		250.2		256.8		519.2		180.7		180.7	
MANGANESE (82.700)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
MERCURY (0.09)	23	10	*	433.6		LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
NICKEL (13.0)	1,600	13,000	*	NS		NS		NS		NS		NS		NS		NS	
POTASSIUM (1,100)	---	---	---	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
SELENIUM (0.37)	390	---	*	NS		NS		NS		NS		NS		NS		NS	
SILVER (0.50)	390	---	---	NS		NS		NS		NS		NS		NS		NS	
SODIUM (130)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
THALLIUM (0.4)	6.3	---	*	NS		NS		NS		NS		NS		NS		NS	
VANADIUM (25.0)	550	---	*	NS		NS		NS		NS		NS		NS		NS	
ZINC (60.2)	23,000	---	*	112.7		186.8		309		219		87.4		280.4		362.6	
CVANIDE (0.50)	1600	---	---	NS		NS		NS		NS		NS		NS		NS	

Table 2
XRF Screening Results
CMC Property
Freeport, Illinois

Sampling Location			Matrix :			Units :			Date Sampled :			Time Sampled :		
XRF-33			Soil			mg/kg			4/12/2005			12:02		
XRF-34			Soil			mg/kg			4/12/2005			12:04		
XRF-35			Soil			mg/kg			4/12/2005			12:07		
XRF-36			Soil			mg/kg			4/12/2005			12:11		
XRF-37			Soil			mg/kg			4/12/2005			12:13		
XRF-38			Soil			mg/kg			4/12/2005			12:16		
XRF-39			Soil			mg/kg			4/12/2005			13:45		
XRF-40			Soil			mg/kg			4/12/2005			13:49		
XRF-41			Soil			mg/kg			4/12/2005			13:51		
XRF-42			Soil			mg/kg			4/12/2005			13:54		
XRF-43			Soil			mg/kg			4/12/2005			13:56		
XRF-44			Soil			mg/kg			4/12/2005			13:59		
XRF-45			Soil			mg/kg			4/12/2005			14:15		
XRF-46			Soil			mg/kg			4/12/2005			14:19		
Exposure Route-specific Values for Soils														
Ingestion (mg/kg)	Inhalation (mg/kg)	ADL (mg/kg)	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
ALUMINUM (8,200)	---	---	NS		NS		NS		NS		NS		NS	
ANTIMONY (3.3)	31	---	*		NS		NS		NS		NS		NS	
ARSENIC (11.3)	---	750	LOD	<	NS		LOD	<	LOD	<	NS		LOD	<
BARIUM (122)	5900	690,000	*		NS		NS		NS		NS		NS	
BERYLLIUM (0.56)	160	1,300	NS		NS		NS		NS		NS		NS	
CADMIUM (0.50)	78	1,800	*		NS		NS		NS		NS		NS	
CALCIUM (5,325)	---	---	NS		NS		NS		NS		NS		NS	
CHROMIUM (13.0)	230	270	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
COBALT (6.9)	4700	---	*		LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
COPPER (12.0)	2900	---	*		LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
IRON (15,000)	---	---	---		13289.2		55061.2		9594		15193.6		13196.6	
LEAD (20.9)	400	---	*		69.1		90.9		64.4		249.2		64.1	
MANGANESE (630)	---	---	NS		NS		NS		NS		NS		NS	
MANGANESE (2,700)	3,700	60,000	*		LOD	<	LOD	<	LOD	<	LOD	<	LOD	<
MERCURY (0.05)	23	10	NS		NS		NS		NS		NS		NS	
NICKEL (13.0)	1,600	13,000	---		281.8		LOD	<	LOD	<	257		315.6	
POTASSIUM (1,100)	---	---	NS		NS		NS		NS		NS		NS	
SELENIUM (0.37)	390	---	*		NS		NS		NS		NS		NS	
SILVER (0.50)	390	---	*		NS		NS		NS		NS		NS	
SODIUM (130)	---	---	NS		NS		NS		NS		NS		NS	
THALLIUM (0.4)	6.3	---	NS		NS		NS		NS		NS		NS	
VANADIUM (25.0)	550	---	*		NS		NS		NS		NS		NS	
ZINC (60.2)	23,000	---	*		72.9		160.2		122.3		483.6		108.9	
CYANIDE (0.50)	1600	---	NS		NS		NS		NS		NS		NS	

Table 2
XRF Screening Results
CMC Property
Freeport, Illinois

Sampling Location :		XRF-64	XRF-65	XRF-66	XRF-67	XRF-68	XRF-69	XRF-70	XRF-71	XRF-72	XRF-73	XRF-1A	XRF-2A	XRF-3A	XRF-4A	XRF-5A	
Matrix :	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	
Units :	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	
Date Sampled :	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	4/12/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005	6/21/2005	
Time Sampled :	16:04	16:37	16:46	16:55	16:58	17:01	17:04	17:06	17:11	17:15							
Exposure Route-specific Values for Soils																	
ANALYTE (Background mg/kg)	Ingestion (mg/kg)	Inhalation (mg/kg)	ADL (mg/kg)	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
ALUMINUM (8.200)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
ANTIMONY (3.3)	31	---	*	NS		NS		NS		NS		NS		NS		NS	
ARSENIC (11.3)	---	750	*	128.5		LOD		LOD		NS		LOD		NS		NS	
BARIUM (122)	---	5500	*	680,000		NS		NS		NS		NS		NS		NS	
BERYLLIUM (0.56)	---	160	*	NS		NS		NS		NS		NS		NS		NS	
CADMIUM (0.50)	---	78	*	NS		NS		NS		NS		NS		NS		NS	
CALCIUM (5.525)	---	---	---	NS		NS		NS		NS		NS		NS		NS	
CHROMIUM (13.0)	---	230	*	LOD		LOD		LOD		LOD		LOD		LOD		NS	
COBALT (8.9)	---	4700	*	968.4		LOD		LOD		LOD		LOD		LOD		NS	
COPPER (12.0)	---	2900	*	LOD		LOD		LOD		LOD		LOD		LOD		NS	
LEAD (20.9)	---	400	*	53682.4		15652.8		14562		6588.8		13388.8		11097.6		15590.4	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS		NS		NS	
MANGANESE (620)	---	---	*	NS		NS		NS		NS		NS					

ANALYTE (Background mg/kg)	Exposure Route-specific Values for Soils			Sampling Location :							
	Ingestion (mg/kg)	Inhalation (mg/kg)	ADL (mg/kg)	Result	Flag	Result	Flag	Result	Flag	Result	Flag
	Units :	Date Sampled :	Time Sampled :	Matrix :	XRF-6A Soil mg/kg 6/21/2005	XRF-7A Soil mg/kg 6/21/2005	XRF-8A Soil mg/kg 6/21/2005	XRF-9A Soil mg/kg 6/21/2005	XRF-10A Soil mg/kg 6/21/2005	XRF-11A Soil mg/kg 6/21/2005	
ALUMINUM (9,200)	---	---	---	NS		NS		NS		NS	
ANTIMONY (3.3)	31	---	*	NS		NS		NS		NS	
ARSENIC (11.3)	---	750	*	LOD	<	LOD	<	LOD	<	148.4	NS
BARIUM (122)	5560	890,000	*	NS		NS		NS		514.4	NS
BERYLLIUM (0.56)	160	1,300	*	NS		NS		NS		NS	
CADMIUM (0.50)	78	1,800	*	NS		NS		NS		NS	
CALCIUM (5,525)	---	---	---	NS		NS		NS		NS	
CHROMIUM (13.0)	230	270	*	---		LOD	<	LOD	<	LOD	<
COBALT (8.9)	4700	---	*	NS		NS		NS		NS	
COOPER (12.0)	2900	---	*	1249.6		LOD	<	LOD	<	LOD	<
IRON (15,000)	---	---	*	46182.4		12198.4		8505.6		9566	
LEAD (20.9)	400	---	*	---		32.1		31.5		55.6	
MAGNESIUM (2,700)	---	---	---	NS		NS		NS		NS	
MANGANESE (930)	3,700	69,000	*	NS		NS		NS		NS	
MERCURY (0.26)	23	10	*	NS		NS		NS		NS	
NICKEL (13.0)	1,600	13,000	---	LOD	<	LOD	<	LOD	<	LOD	<
POTASSIUM (1,100)	---	---	*	NS		NS		NS		NS	
SELENIUM (0.37)	390	---	---	NS		NS		NS		NS	
SILVER (0.50)	390	---	*	NS		NS		NS		NS	
SODIUM (130)	---	---	*	NS		NS		NS		NS	
TALLIUM (0.4)	6.3	---	*	NS		NS		NS		NS	
VANADIUM (25.0)	550	---	*	NS		NS		NS		NS	
ZINC (60.2)	23,000	---	*	2649.6		136.1		107.4		207.8	
CYANIDE (0.50)	1600	---	---	NS		NS		NS		NS	

**CMC Property
Freeport, Illinois**

[illegible]

Table 3 Soil Analytical Results
Semi-volatile Organic Compounds
CMC Property
Freeport, Illinois

Exposure Route-Specific Values		Soil Component of the Groundwater Ingestion Exposure Route		Sample Number		Sampling Location		Date Sampled		Time Sampled		Depth of Sample		E0001		E0002		E0003		E0004		E0005		E0006		E0007		E0008		E0009		E0010		E0011		E0012		E0013		E0014		E0015		E0016		E0017		E0018		E0019		E0020		E0021		E0022		E0023		E0024		E0025		E0026		E0027		E0028		E0029		E0030		E0031		E0032		E0033		E0034		E0035		E0036		E0037		E0038		E0039		E0040		E0041		E0042		E0043		E0044		E0045		E0046		E0047		E0048		E0049		E0050		E0051		E0052		E0053		E0054		E0055		E0056		E0057		E0058		E0059		E0060		E0061		E0062		E0063		E0064		E0065		E0066		E0067		E0068		E0069		E0070		E0071		E0072		E0073		E0074		E0075		E0076		E0077		E0078		E0079		E0080		E0081		E0082		E0083		E0084		E0085		E0086		E0087		E0088		E0089		E0090		E0091		E0092		E0093		E0094		E0095		E0096		E0097		E0098		E0099		E0100		E0101		E0102		E0103		E0104		E0105		E0106		E0107		E0108		E0109		E0110		E0111		E0112		E0113		E0114		E0115		E0116		E0117		E0118		E0119		E0120		E0121		E0122		E0123		E0124		E0125		E0126		E0127		E0128		E0129		E0130		E0131		E0132		E0133		E0134		E0135		E0136		E0137		E0138		E0139		E0140		E0141		E0142		E0143		E0144		E0145		E0146		E0147		E0148		E0149		E0150		E0151		E0152		E0153		E0154		E0155		E0156		E0157		E0158		E0159		E0160		E0161		E0162		E0163		E0164		E0165		E0166		E0167		E0168		E0169		E0170		E0171		E0172		E0173		E0174		E0175		E0176		E0177		E0178		E0179		E0180		E0181		E0182		E0183		E0184		E0185		E0186		E0187		E0188		E0189		E0190		E0191		E0192		E0193		E0194		E0195		E0196		E0197		E0198		E0199		E0200		E0201		E0202		E0203		E0204		E0205		E0206		E0207		E0208		E0209		E0210		E0211		E0212		E0213		E0214		E0215		E0216		E0217		E0218		E0219		E0220		E0221		E0222		E0223		E0224		E0225		E0226		E0227		E0228		E0229		E0230		E0231		E0232		E0233		E0234		E0235		E0236		E0237		E0238		E0239		E0240		E0241		E0242		E0243		E0244		E0245		E0246		E0247		E0248		E0249		E0250		E0251		E0252		E0253		E0254		E0255		E0256		E0257		E0258		E0259		E0260		E0261		E0262		E0263		E0264		E0265		E0266		E0267		E0268		E0269		E0270		E0271		E0272		E0273		E0274		E0275		E0276		E0277		E0278		E0279		E0280		E0281		E0282		E0283		E0284		E0285		E0286		E0287		E0288		E0289		E0290		E0291		E0292		E0293		E0294		E0295		E0296		E0297		E0298		E0299		E0300		E0301		E0302		E0303		E0304		E0305		E0306		E0307		E0308		E0309		E0310		E0311		E0312		E0313		E0314		E0315		E0316		E0317		E0318		E0319		E0320		E0321		E0322		E0323		E0324		E0325		E0326		E0327		E0328		E0329		E0330		E0331		E0332		E0333		E0334		E0335		E0336		E0337		E0338		E0339		E0340		E0341		E0342		E0343		E0344		E0345		E0346		E0347		E0348		E0349		E0350		E0351		E0352		E0353		E0354		E0355		E0356		E0357		E0358		E0359		E0360		E0361		E0362		E0363		E0364		E0365		E0366		E0367		E0368		E0369		E0370		E0371		E0372		E0373		E0374		E0375		E0376		E0377		E0378		E0379		E0380		E0381		E0382		E0383		E0384		E0385		E0386		E0387		E0388		E0389		E0390		E0391		E0392		E0393		E0394		E0395		E0396		E0397		E0398		E0399		E0400		E0401		E0402		E0403		E0404		E0405		E0406		E0407		E0408		E0409		E0410		E0411		E0412		E0413		E0414		E0415		E0416		E0417		E0418		E0419		E0420		E0421		E0422		E0423		E0424		E0425		E0426		E0427		E0428		E0429		E0430		E0431		E0432		E0433		E0434		E0435		E0436		E0437		E0438		E0439		E0440		E0441		E0442		E0443		E0444		E0445		E0446		E0447		E0448		E0449		E0450		E0451		E0452		E0453		E0454		E0455		E0456		E0457		E0458		E0459		E0460		E0461		E0462		E0463		E0464		E0465		E0466		E0467		E0468		E0469		E0470		E0471		E0472		E0473		E0474		E0475		E0476		E0477		E0478		E0479		E0480		E0481		E0482		E0483		E0484		E0485		E0486		E0487		E0488		E0489		E0490		E0491		E0492		E0493		E0494		E0495		E0496		E0497		E0498		E0499		E0500		E0501		E0502		E0503		E0504		E0505		E0506		E0507		E0508		E0509		E0510		E0511		E0512		E0513		E0514		E0515		E0516		E0517		E0518		E0519		E0520		E0521		E0522		E0523		E0524		E0525		E0526		E0527		E0528		E0529		E0530		E0531		E0532		E0533		E0534		E0535		E0536		E0537		E0538		E0539		E0540		E0541		E0542		E0543		E0544		E0545		E0546		E0547		E0548		E0549		E0550		E0551		E0552		E0553		E0554		E0555		E0556		E0557		E0558		E0559		E0560		E0561		E0562		E0563		E0564		E0565		E0566		E0567		E0568		E0569		E0570		E0571		E0572		E0573		E0574		E0575		E0576		E0577		E0578		E0579		E0580		E0581		E0582		E0583		E0584		E0585		E0586		E0587		E0588		E0589		E0590		E0591		E0592		E0593		E0594		E0595		E0596		E0597		E0598		E0599		E0600		E0601		E0602		E0603		E0604		E0605		E0606		E0607		E0608		E0609		E0610		E0611		E0612		E0613		E0614		E0615		E0616		E0617		E0618		E0619		E0620		E0621		E0622		E0623		E0624		E0625		E0626		E0627		E0628		E0629		E0630		E0631		E0632		E0633		E0634		E0635		E0636		E0637		E0638		E0639		E0640		E0641		E0642		E0643		E0644		E0645		E0646		E0647		E0648		E0649		E0650		E0651		E0652		E0653		E0654		E0655		E0656		E0657		E0658		E0659		E0660		E0661		E0662		E0663		E0664		E0665		E0666		E0667		E0668		E0669		E0670		E0671		E0672		E0673		E0674		E0675		E0676		E0677		E0678		E0679		E0680		E0681		E0682		E0683		E0684		E0685		E0686		E0687		E0688		E0689		E0690		E0691		E0692		E0693		E0694		E0695		E0696		E0697		E0698		E0699		E0700		E0701		E0702		E0703		E0704		E0705		E0706		E0707		E0708		E0709		E0710		E0711		E0712		E0713		E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**Table 4. Groundwater Analytical Results
Inorganic Compounds
CMC Property
Freeport, Illinois**

Sample Number :			ME00D4		ME00D5		ME00D6		ME00D7		ME00D8		ME00D9	
Sampling Location :			MW1		MW2		MW3		MW4		MW5		MW6	
Matrix :			Water		Water		Water		Water		Water		Water	
Units :			ug/L		ug/L		ug/L		ug/L		ug/L		ug/L	
Date Sampled :			06/10/2003		06/10/2003		06/10/2003		06/10/2003		06/10/2003		06/10/2003	
Time Sampled :			13:55		12:15		14:35		15:05		11:40		10:45	
ANALYTE	Class I	Class II	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
	(ug/L)	(ug/L)												
ALUMINUM	---	---	251		308		897		2610		6660		193	
ANTIMONY	6	24												
ARSENIC	50	200	15.0	U	15.0	U	18.2		15.0	U	407		15.0	U
BARIUM	2000	2000	162		90.1		161		154		652		93.5	
BERYLLIUM	4	500												
CADMIUM	5	50	0.42		5.0	U	0.84		1.7		1.4		5.0	U
CALCIUM	---	---	164000		84200		167000		121000		72200		91700	
CHROMIUM	100	1000	1.7		1.2		3.7		13.7		13.8		0.90	
COBALT	1000	1000	50.0	U	1.6		10.3		9.6		18.5		50.0	U
COPPER	650	650	4.2		5.6		16.8		19.6		11.7		3.7	
IRON	5000	5000			603									
LEAD	7.5	100												
MAGNESIUM	---	---	53900		48000		61700		43500		59700		40900	
MANGANESE	150	10000												
MERCURY	2	10	0.20	U	0.20	U	0.20	U	0.20	U	0.20	U	0.20	U
NICKEL	100	2000	40.0	U	40.0	U	5.0		14.6		17.3		40.0	U
POTASSIUM	---	---	776		2130		8220		3320		1490		639	
SELENIUM	50	50	35.0	U	35.0	U	35.0	U	35.0	U	35.0	U	35.0	U
SILVER	50	---	0.99		0.75		0.98		0.74		10.0	U	10.0	U
SODIUM	---	---	16200		49300		41000		25100		32300		42000	
THALLIUM	2	20												
VANADIUM	49	100	11.5		11.9		22.6		16.4		36.5		9.6	
ZINC	5000	10000	60.0	U	60.0	U	70.1		65.0		42.7		60.0	U
CYANIDE	200	600	10.0	U	10.0	U	35.2		10.0	U	10.0	U	10.0	U

Table 5 – Summary of Groundwater Modeling

Target Compounds	Groundwater Source Location	Groundwater Source Concentration	Modeled Distance from Source to Tier 1 Remediation Objective
Lead	MW-3	21.7 ul/L	120
Manganese	MW-4	16200 ug/L	815

Table 6 – Summary of the Soil Exposure Routes

Target Compounds	Soil Exposure Route		Soil Component of the Groundwater Ingestion Exposure Route		ADL
	Ingestion (mg/kg)	Inhalation (mg/kg)	Class I (mg/kg)	Class II (mg/kg)	
Copper	X				
Lead	X		X	X	
Manganese	X	X			
Nickel	X				
Zinc	X				

APPENDIX A

ANALYTICAL RESULTS

**PDC Laboratories, Inc.**

P.O. Box 9071 • Peoria, IL 61612-9071

(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

**Laboratory Results**Fehr-Graham & Associates
221 E. Main St. #200Freeport, IL 61032
Attn: Mr. Chris Posey

Date Received: 07/11/05 09:00

Report Date: 07/27/05

Customer #: 206007

P.O. Number:

Facility: FREEPORT OFFICE

Sample No: 05071859-1

Collect Date: 07/07/05 14:55

Client ID: PROJECT#45399

Site: 19563 S-2

Locator: FILL

Parameter	Qualifier	Result	Analysis Date	Analyst
SM2540B				
Moisture		24.4 %	07/22/05 07:51	MH/KD
-846 1311				
Final pH		5.66	07/12/05 11:30	JMM
Leachate Preparation			07/12/05 11:30	JMM
SW-846 3015				
Sample Preparation			07/13/05 05:00	JMM
SW-846 3051				
Sample Preparation			07/13/05 07:00	JEM
SW1312				
Sample Preparation			07/13/05 11:50	JMM
SW6010B				
Arsenic		28 mg/kg	07/14/05 07:38	JMW
Arsenic		37 mg/kg Dry	07/14/05 07:38	JMW
Barium		320 mg/kg	07/14/05 07:38	JMW
Barium		420 mg/kg Dry	07/14/05 07:38	JMW
Cadmium		2.1 mg/kg	07/14/05 07:38	JMW
Cadmium		2.8 mg/kg Dry	07/14/05 07:38	JMW
Chromium		120 mg/kg	07/14/05 07:38	JMW
Chromium		160 mg/kg Dry	07/14/05 07:38	JMW
Lead		15000 mg/kg	07/14/05 07:38	JMW
Lead		20000 mg/kg Dry	07/14/05 07:38	JMW
Selenium	J	15 mg/kg	07/14/05 07:38	JMW
Selenium	J	20 mg/kg Dry	07/14/05 07:38	JMW
Silver	J	7.9 mg/kg	07/14/05 07:38	JMW
Silver	J	10 mg/kg Dry	07/14/05 07:38	JMW
SW6010B SPLP				
Arsenic, SPLP	U	0.05 mg/l	07/14/05 11:13	JMW
Barium, SPLP	J	0.3 mg/l	07/14/05 11:13	JMW
Cadmium, SPLP	U	0.002 mg/l	07/14/05 11:13	JMW
Chromium, SPLP		0.018 mg/l	07/14/05 11:13	JMW
Lead, SPLP		0.79 mg/l	07/14/05 11:13	JMW
Selenium, SPLP	U	0.02 mg/l	07/14/05 11:13	JMW
Silver, SPLP	U	0.01 mg/l	07/14/05 11:13	JMW
SW6010B TCLP				
Arsenic, TCLP	U	0.05 mg/l	07/14/05 09:51	JMW
Barium, TCLP	J	0.97 mg/l	07/14/05 09:51	JMW
Cadmium, TCLP		0.014 mg/l	07/14/05 09:51	JMW

**PDC Laboratories, Inc.**P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9685**Laboratory Results**Fehr-Graham & Associates
221 E. Main St. #200Freeport, IL 61032
Attn: Mr. Chris Posey

Date Received : 07/11/05 09:00

Report Date : 07/27/05

Customer # : 206007

P.O. Number :

Facility : FREEPORT OFFICE

Sample No: 05071859-1

Collect Date : 07/07/05 14:55

Client ID : PROJECT#45399

Site : 19563 S-2

Locator : FILL

Parameter	Qualifier	Result	Analysis Date	Analyst
SW6010B TCLP				
Chromium, TCLP	J	0.0011 mg/l	07/14/05 09:51	JMW
Lead, TCLP		10 mg/l	07/14/05 09:51	JMW
Selenium, TCLP	U	0.02 mg/l	07/14/05 09:51	JMW
Silver, TCLP	U	0.01 mg/l	07/14/05 09:51	JMW
SW7470 SPLP				
Mercury, SPLP	U	0.06 mg/l	07/22/05 13:20	NJS
SW7470 TCLP				
Mercury, TCLP	U	0.2 mg/l	07/22/05 13:14	NJS
SW7471				
Sample Preparation			07/14/05 13:30	NJS
SW7471				
Mercury		0.35 mg/kg	07/15/05 09:31	JVH
Mercury		0.46 mg/kg Dry	07/15/05 09:31	JVH
SW8310				
Sample Preparation			07/20/05 01:45	CP,EMS
9310				
Acenaphthene	U	67 ug/kg	07/21/05 15:52	BL
Acenaphthene	U	89 ug/kg Dry	07/21/05 15:52	BL
Acenaphthylene	U	67 ug/kg	07/21/05 15:52	BL
Acenaphthylene	U	89 ug/kg Dry	07/21/05 15:52	BL
Anthracene	U	67 ug/kg	07/21/05 15:52	BL
Anthracene	U	89 ug/kg Dry	07/21/05 15:52	BL
Benzo(a)Anthracene		82 ug/kg	07/21/05 15:52	BL
Benzo(a)Anthracene		110 ug/kg Dry	07/21/05 15:52	BL
Benzo(a)Pyrene	U	6.7 ug/kg	07/21/05 15:52	BL
Benzo(a)Pyrene	U	8.9 ug/kg Dry	07/21/05 15:52	BL
Benzo(b)Fluoranthene		120 ug/kg	07/21/05 15:52	BL
Benzo(b)Fluoranthene		160 ug/kg Dry	07/21/05 15:52	BL
Benzo(g,h,i)Perylene	U	6.7 ug/kg	07/21/05 15:52	BL
Benzo(g,h,i)Perylene	U	8.9 ug/kg Dry	07/21/05 15:52	BL
Benzo(k)Fluoranthene	U	3.4 ug/kg	07/21/05 15:52	BL
Benzo(k)Fluoranthene	U	4.5 ug/kg Dry	07/21/05 15:52	BL
Chrysene		67 ug/kg	07/21/05 15:52	BL
Chrysene		89 ug/kg Dry	07/21/05 15:52	BL
Dibenz(a,h)Anthracene	U	6.7 ug/kg	07/21/05 15:52	BL
Dibenz(a,h)Anthracene	U	8.9 ug/kg Dry	07/21/05 15:52	BL
Fluoranthene		530 ug/kg	07/21/05 15:52	BL
Fluoranthene		700 ug/kg Dry	07/21/05 15:52	BL





PDC Laboratories, Inc.

P.O. Box 9071 • Peoria, IL 61612-9071

(309) 692-9658 • (800) 752-6551 • FAX: (309) 692-9659



Laboratory Results

Fehr-Graham & Associates
221 E. Main St. #200

Freeport, IL 61032
Attn: Mr. Chris Posey

Date Received : 07/11/05 09:00

Report Date 07/27/05

Customer # : 206007

P.O. Number :

Facility : FREEPORT OFFICE

Sample No: 05071859-1

Collect Date : 07/07/05 14:55

Client ID : PROJECT#45399

Site : 19563 S-2

Locator : FILL

Parameter	Qualifier	Result	Analysis Date	Analyst
SW8310				
Fluorene	U	67 ug/kg	07/21/05 15:52	BL
orene	U	89 ug/kg Dry	07/21/05 15:52	BL
Indeno(1,2,3-cd)Pyrene	U	6.7 ug/kg	07/21/05 15:52	BL
Indeno(1,2,3-cd)Pyrene	U	8.9 ug/kg Dry	07/21/05 15:52	BL
Naphthalene	U	67 ug/kg	07/21/05 15:52	BL
Naphthalene	U	89 ug/kg Dry	07/21/05 15:52	BL
Phenanthrene		99 ug/kg	07/21/05 15:52	BL
Phenanthrene		130 ug/kg Dry	07/21/05 15:52	BL
Pyrene		430 ug/kg	07/21/05 15:52	BL
Pyrene		570 ug/kg Dry	07/21/05 15:52	BL

SW846 3015 SPLP

Sample Preparation

07/14/05 05:00

JMM

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230

State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533

Drinking Water Certifications: Indiana (C-IL-040); Kansas (E-10338); Kentucky (90058); Missouri (00870); Wisconsin (998294430)

Wastewater Certifications: Arkansas; Iowa (240); Kansas (E-10338); Wisconsin (99829443)

Hazardous/Solid Waste Certifications: Arkansas; Kansas (E-10338); Wisconsin (998294430)

UST Certification: Iowa (240)

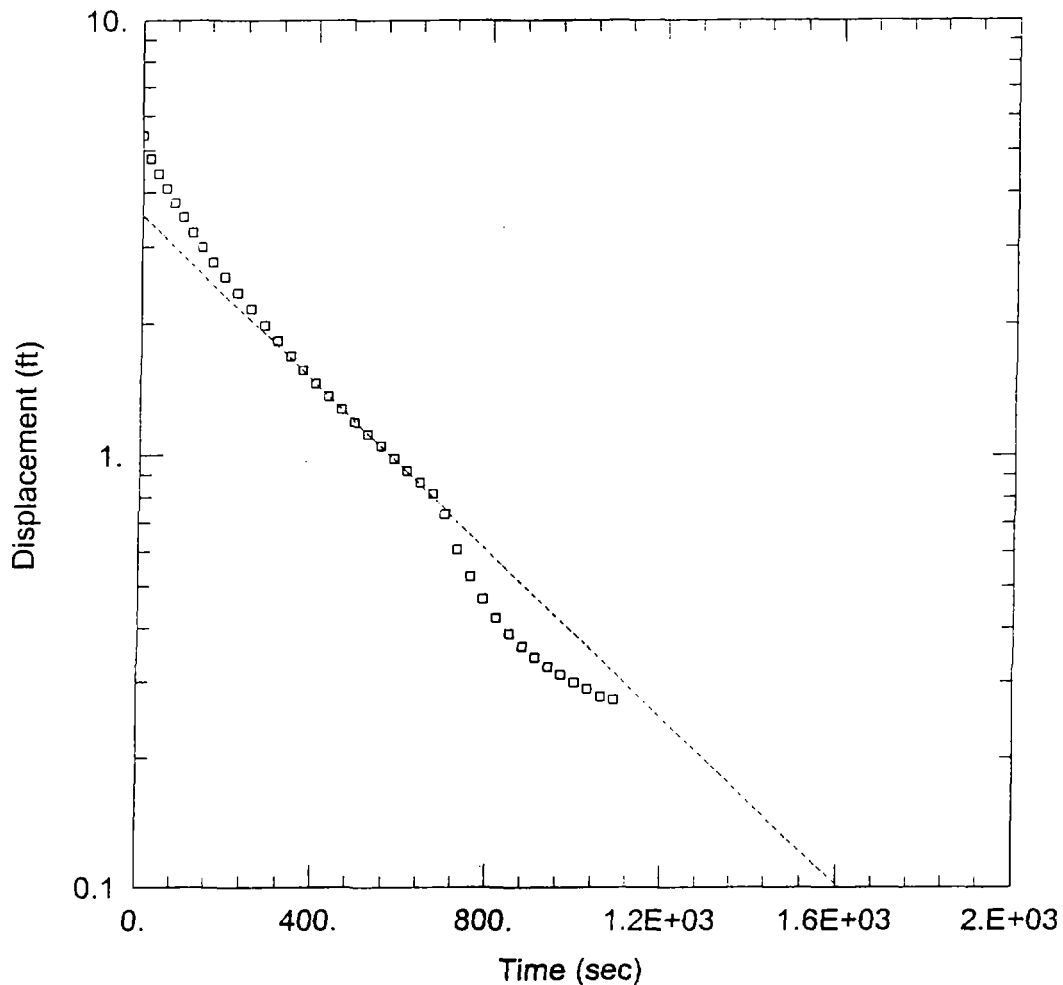
Certified by :


Kurt C. Stepping, Director of Client Services

This report shall not be reproduced, except in full, without the written approval of the laboratory.

APPENDIX B

TEST RESULTS



MW-3 SLUG OUT

Data Set: I:\Documents\2002\42209\CMC\MW-3 Pump Out.agt

Date: 05/19/03

Time: 14:38:25

PROJECT INFORMATION

Company: Fehr-Graham & Associates

Client: City of Freeport

Project: 42209

Test Well: MW-3

Test Date: 5/16/03

AQUIFER DATA

Saturated Thickness: 12.6 ft

Anisotropy Ratio (K_z/K_r): 1.

WELL DATA (MW-3)

Initial Displacement: 5.406 ft

Static Water Column Height: 12.6 ft

Total Well Penetration Depth: 12.6 ft

Screen Length: 10. ft

Casing Radius: 0.083 ft

Wellbore Radius: 0.333 ft

Gravel Pack Porosity: 0.15

SOLUTION

Aquifer Model: Unconfined

Solution Method: Bouwer-Rice

$K = 0.0002065$ cm/sec

$y_0 = 3.548$ ft

Data Set: I:\Documents\2002\42209\CMC\MW-3 Pump Out.aqt
 Title: MW-3 SLUG OUT
 Date: 05/19/03
 Time: 14:38:39

PROJECT INFORMATION

Company: Fehr-Graham & Associates
 Client: City of Freeport
 Project: 42209
 Test Date: 5/16/03
 Test Well: MW-3

AQUIFER DATA

Saturated Thickness: 12.6 ft
 Anisotropy Ratio (K_z/K_r): 1.

SLUG TEST WELL DATA

Test Well: : MW-3

X Location: 0. ft
 Y Location: 0. ft

Initial Displacement: 5.406 ft
 Static Water Column Height: 12.6 ft
 Casing Radius: 0.083 ft
 Wellbore Radius: 0.333 ft
 Well Skin Radius: 0.333 ft
 Screen Length: 10. ft
 Total Well Penetration Depth: 12.6 ft
 Corrected Casing Radius (Bouwer-Rice Method): 0.15 ft
 Gravel Pack Porosity: 0.15

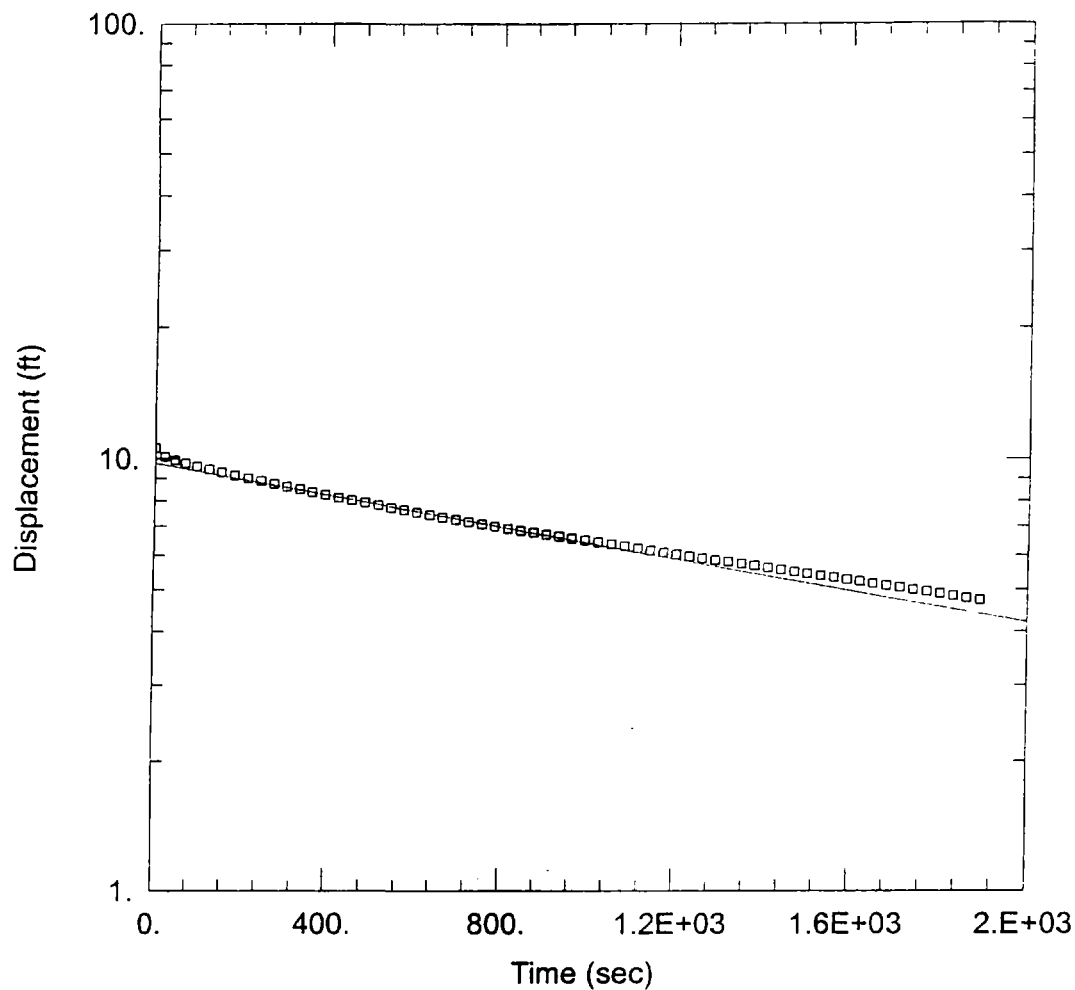
No. of Observations: 39

Observation Data			
Time (sec)	Displacement (ft)	Time (sec)	Displacement (ft)
16.8	4.786	550.3	1.049
34.6	4.412	580.3	0.98
53.4	4.082	610.3	0.92
73.3	3.784	640.3	0.866
94.4	3.516	670.3	0.815
116.8	3.242	700.3	0.733
140.5	3.003	730.3	0.607
165.6	2.771	760.3	0.527
192.2	2.568	790.3	0.467
220.4	2.356	820.3	0.422
250.3	2.163	850.3	0.388
280.3	1.983	880.3	0.362
310.3	1.829	910.3	0.342
340.3	1.683	940.3	0.325
370.3	1.565	970.3	0.312
400.3	1.46	1000.3	0.299
430.3	1.366	1030.3	0.289
460.3	1.276	1060.3	0.277
490.3	1.19	1090.3	0.273
520.3	1.117		

SOLUTION

Aquifer Model: Unconfined
 Solution Method: Bouwer-Rice
 Shape Factor: 2.715

VISUAL ESTIMATION RESULTS



MW-4 SLUG OUT

Data Set: I:\Documents\2002\42209\CMC\MW-4 Pump Out.agt

Date: 05/19/03

Time: 14:35:40

PROJECT INFORMATION

Company: Fehr-Graham & Associates

Client: City of Freeport

Project: 42209

Test Well: MW-4

Test Date: 5/16/03

AQUIFER DATA

Saturated Thickness: 11.43 ft

Anisotropy Ratio (Kz/Kr): 1.

WELL DATA (MW-4)

Initial Displacement: 10.57 ft

Static Water Column Height: 11.43 ft

Total Well Penetration Depth: 11.43 ft

Screen Length: 10. ft

Casing Radius: 0.083 ft

Wellbore Radius: 0.333 ft

Gravel Pack Porosity: 0.15

SOLUTION

Aquifer Model: Unconfined

Solution Method: Bouwer-Rice

K = 3.827E-05 cm/sec

y0 = 9.747 ft

Data Set: I:\Documents\2002\42209\CMC\MW-4 Pump Out.aqt
 Title: MW-4 SLUG OUT
 Date: 05/19/03
 Time: 14:35:54

PROJECT INFORMATION

Company: Fehr-Graham & Associates
 Client: City of Freeport
 Project: 42209
 Test Date: 5/16/03
 Test Well: MW-4

AQUIFER DATA

Saturated Thickness: 11.43 ft
 Anisotropy Ratio (Kz/Kr): 1.

SLUG TEST WELL DATA

Test Well: : MW-4

X Location: 0. ft
 Y Location: 0. ft

Initial Displacement: 10.57 ft
 Static Water Column Height: 11.43 ft
 Casing Radius: 0.083 ft
 Wellbore Radius: 0.333 ft
 Well Skin Radius: 0.333 ft
 Screen Length: 10. ft
 Total Well Penetration Depth: 11.43 ft
 Corrected Casing Radius (Bouwer-Rice Method): 0.15 ft
 Gravel Pack Porosity: 0.15

No. of Observations: 64

Observation Data			
Time (sec)	Displacement (ft)	Time (sec)	Displacement (ft)
22.4	10.09	965.9	6.554
46.1	9.914	995.9	6.486
71.2	9.75	1025.9	6.419
97.8	9.596	1055.9	6.355
126.	9.443	1085.9	6.291
155.9	9.295	1115.9	6.224
185.9	9.141	1145.9	6.16
215.9	9.001	1175.9	6.095
245.9	8.875	1205.9	6.035
275.9	8.751	1235.9	5.973
305.9	8.618	1265.9	5.913
335.9	8.493	1295.9	5.853
365.9	8.371	1325.9	5.795
395.9	8.253	1355.9	5.737
425.9	8.135	1385.9	5.677
455.9	8.024	1415.9	5.617
485.9	7.918	1445.9	5.559
515.9	7.811	1475.9	5.501
545.9	7.71	1505.9	5.445
575.9	7.612	1535.9	5.389
605.9	7.515	1565.9	5.336
635.9	7.421	1595.9	5.278
665.9	7.331	1625.9	5.222
695.9	7.241	1655.9	5.168
725.9	7.155	1685.9	5.113
755.9	7.069	1715.9	5.055
785.9	6.983	1745.9	5.003
815.9	6.9	1775.9	4.949
845.9	6.829	1805.9	4.894

<u>Time (sec)</u>	<u>Displacement (ft)</u>	<u>Time (sec)</u>	<u>Displacement (ft)</u>
875.9	6.758	1835.9	4.84
905.9	6.687	1865.9	4.786
935.9	6.619	1895.9	4.732

SOLUTION

Aquifer Model: Unconfined
Solution Method: Bouwer-Rice
Shape Factor: 2.655

VISUAL ESTIMATION RESULTSEstimated Parameters

<u>Parameter</u>	<u>Estimate</u>	
K	3.827E-05	cm/sec
y0	9.747	ft

PENDIX

ENDWATER

Groundwater Ingestion Exposure Route (Class I) - Lead*(MW-3 to Tier 1 Remediation Objective)***Site Name:** CMC**Location:** Freeport, IL**IEMA Incident #:****FGA Project #:** 45399

Parameter	Symbol	Input/Value	Units	Calculated Value	Units
Distance from planar source to the location of concern, along center line of the plume parallel to the down-gradient direction of groundwater flow.	X	120	feet	3657.6	cm
First Order Degradation Constant	λ			0	d ⁻¹
Hydraulic Conductivity	K	2.07E-04	cm/s	1.78E+01	cm/d
Hydraulic Gradient	i			0.00088	unitless
Total Soil Porosity	θ_T			0.32	unitless
Source width Perpendicular to Groundwater Flow Direction in Horizontal Plane	S_w	50	feet	1524	cm
Source Width Perpendicular to Groundwater Flow Direction in Vertical Plane	S_d	10	feet	304.8	cm
Calculations					
R16					
Longitudinal Dispersivity	α_x			365.76	cm
R17					
Transverse Dispersivity	α_y			1.22E+02	cm
R18					
Vertical Dispersivity	α_z			18.288	cm
R19					
Specific Discharge	U			0.0490644	cm/d
R26					
Standard at Point of Compliance				0.0075	mg/L
Groundwater source concentration	$C_{source(a)} =$			0.0217	mg/L
Groundwater concentration X feet from source	$C_{(x)} =$			0.0075	mg/L
Calculated Remediation Objective at the Source with point of compliance X feet from the source.	$C_{source(c)} =$			0.0217	mg/L

Groundwater Ingestion Exposure Route (Class I) - Manganese*(MW-4 to Tier 1 Remediation Objective)***Site Name:** CMC**Location:** Freeport, IL**IEMA Incident #:****FGA Project #:** 43494 - A11

Parameter	Symbol	Input/Value	Units	Calculated Value	Units
Distance from planar source to the location of concern, along center line of the plume parallel to the down-gradient direction of groundwater flow.	X	815	feet	24841.2	cm
First Order Degradation Constant	λ			0	d ⁻¹
Hydraulic Conductivity	K	2.07E-04	cm/s	1.78E+01	cm/d
Hydraulic Gradient	i			0.00088	unitless
Total Soil Porosity	θ_T			0.32	unitless
Source width Perpendicular to Groundwater Flow Direction in Horizontal Plane	S_w	50	feet	1524	cm
Source Width Perpendicular to Groundwater Flow Direction in Vertical Plane	S_d	10	feet	304.8	cm
Calculations					
R16					
Longitudinal Dispersivity	α_x			2484.12	cm
R17					
Transverse Dispersivity	α_y			8.28E+02	cm
R18					
Vertical Dispersivity	α_z			124.206	cm
R19					
Specific Discharge	U			0.0490644	cm/d
R26					
Standard at Point of Compliance				0.150	mg/L
Groundwater source concentration	$C_{source(a)} =$			16.2	mg/L
Groundwater concentration X feet from source	$C_{(x)} =$			0.150	mg/L
Calculated Remediation Objective at the Source with point of compliance X feet from the source.	$C_{source(c)} =$			16.2	mg/L

APPENDIX

GROUNDWATER

MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF FREEPORT
AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING
THE USE OF A LOCAL GROUNDWATER OR WATER WELL ORDINANCE AS
AN ENVIRONMENTAL INSTITUTIONAL CONTROL

I. PURPOSE AND INTENT

A. This Memorandum of Understanding ("MOU") between the City of Freeport and the Illinois Environmental Protection Agency ("Illinois EPA") is entered into for the purpose of satisfying the requirements of 35 Ill. Adm. Code 742.1015 for the use of groundwater or water well ordinances as environmental institutional controls. The Illinois EPA has reviewed the groundwater or water well ordinance of the City of Freeport (Attachment A) and determined that the ordinance prohibits the use of groundwater for potable purposes and/or the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the unit of local government itself. In such cases, 35 Ill. Adm. Code 742.1015(a) provides that the unit of local government may enter into an MOU with the Illinois EPA to allow the use of the ordinance as an institutional control.

B. The intent of this Memorandum of Understanding is to specify the responsibilities that must be assumed by the unit of local government to satisfy the requirements for MOUs as set forth at 35 Ill. Adm. Code 742.1015(i).

II. DECLARATIONS AND ASSUMPTION OF RESPONSIBILITY

In order to ensure the long-term integrity of the groundwater or water well ordinance as an environmental institutional control and that risk to human health and the environment from contamination left in place in reliance on the groundwater or water well ordinance is effectively managed, the City of Freeport hereby assumes the following responsibilities pursuant to 35 Ill. Adm. Code 742.1015(d)(2) and (i):

A. The City of Freeport will notify the Illinois EPA Bureau of Land of any proposed ordinance changes or requests for variance at least 30 days prior to the date the local government is scheduled to take action on the proposed change or request (35 Ill. Adm. Code 742.1015(i)(4));

B. The City of Freeport will maintain a registry of all sites within its corporate limits that have received "No Further Remediation" determinations from the Illinois EPA (35 Ill. Adm. Code 742.1015(i)(5));

C. The City of Freeport will review the registry of sites established under paragraph II. B. prior to siting public potable water supply wells within the area covered by the ordinance (35 Ill. Adm. Code 742.1015(i)(6)(A));

D. The City of Freeport will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under paragraphs II. B. and C. (35 Ill. Adm. Code 742.1015(i)(6)(B)); and

E. The City of Freeport will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply (35 Ill. Adm. Code 742.1015(i)(6)(C)).

RECEIVED

AUG 13 2004

IEPA/BOL

NOTE: Notification under paragraph II. A. above or other communications concerning this MOU should be directed to:

Manager, Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL 62794-9276

III. SUPPORTING DOCUMENTATION

The following documentation is required by 35 Ill. Adm. Code 742.1015(i) and is attached to this MOU:

- A. Attachment A: A copy of the groundwater or water well ordinance certified by the city clerk or other official as the current, controlling law (35 Ill. Adm. Code 742.1015(i)(3));
- B. Attachment B: Identification of the legal boundaries within which the ordinance is applicable certification by city clerk or other official that the ordinance is applicable everywhere within the corporate limits; if ordinance is not applicable throughout the entire city or village, legal description and map of area showing sufficient detail to determine where ordinance is applicable) (35 Ill. Adm. Code 742.1015(i)(2));
- C. Attachment C: A statement of the authority of the unit of local government to enter into the MOU council resolution, code of ordinances, inherent powers of mayor or other official signing MOU -- attach copies) (35 Ill. Adm. Code 742.1015(i)(1)).

IN WITNESS WHEREOF, the lawful representatives of the parties have caused this MOU to be signed as follows:

FOR: The City of Freeport

BY: 
(James L. Gitz, Mayor)

DATE: 8-9-04

FOR: Illinois Environmental Protection Agency

BY: 
(Name and title of signatory)

DATE: 8/20/04

Manager, Division of Remediation Management

City Clerk's Certificate of Copy

STATE OF ILLINOIS

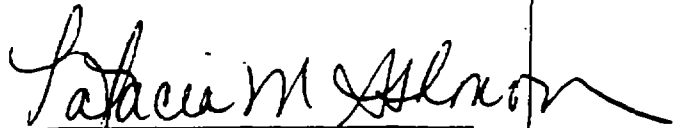
SS.

STEPHENSON COUNTY

I, Latacia M. Ishmon, City Clerk of the City of Freeport, Illinois, do hereby certify that the attached are true and correct copies of Ordinance #2004-12, An ordinance prohibiting the use of Groundwater as a potable water supply by the installation or use of potable water supply wells or by any other method, passed by the Freeport City Council on March 15, 2004.

I further certify that as City Clerk, I am the keeper of all city records, ordinances and resolutions and that the originals of the attached documents are on file in my office.

In Witness Whereof, I have herewith set my hand and affixed the seal of the City of Freeport, Illinois, this 10th day of August, 2004.

A handwritten signature in cursive script, reading "Latacia M. Ishmon", written over a horizontal line.

City Clerk

Attachment A

CITY OF FREEPORT
STEPHENSON COUNTY, ILLINOIS

ORDINANCE NO. 2004-12

AN ORDINANCE PROHIBITING THE USE OF GROUNDWATER AS A
POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE
WATER SUPPLY WELLS OR BY ANY OTHER METHOD

ADOPTED BY THE
CITY COUNCIL
OF THE
CITY OF FREEPORT, ILLINOIS

THIS 15th DAY OF March, 2004

Published in pamphlet form by authority of the
City Council of the City of Freeport,
Stephenson County, Illinois, this

15th day of March, 2004.

**AN ORDINANCE PROHIBITING THE USE OF GROUNDWATER AS A
POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE
WATER SUPPLY WELLS OR BY ANY OTHER METHOD**

ORDINANCE NO. 2004-12

WHEREAS, certain properties in the City of Freeport, Illinois have been used over a period of time for commercial/industrial purposes; and

WHEREAS, because of said use, concentrations of certain chemical constituents in the groundwater beneath the City may exceed Class I groundwater quality standards for potable resource groundwater as set for the in 35 Illinois Administrative Code 620 or Tier 1 residential remediation objectives as set forth in 35 Illinois Administrative Code 742; and

WHEREAS, the City of Freeport desires to limit potential threats to human health from groundwater contamination while facilitating the redevelopment and productive use of properties that are the source of said chemical constituents;

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF
THE CITY OF FREEPORT, ILLINOIS** as follows:

Section 1. Use of groundwater as a potable water supply prohibited. Except for such uses or methods in existence before the effective date of this ordinance, the use or attempt to use as a potable water supply groundwater from certain areas within the corporate limits of the City of Freeport, specifically described in Attachment A hereto, by the installation or drilling of wells or by any other method is hereby prohibited, except at points of withdrawal by the City of Freeport.

Section 2. Any person violating the provisions of this ordinance shall be subject to a fine of up to \$ 700.00 for each violation.

Section 3. Definitions.

"Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, ~~political~~ subdivision, or any other legal entity, or their legal representatives, agents or assigns.

"Potable water" is any water used for human or domestic consumption, including, but not limited to, water used for drinking, bathing, swimming, washing dishes, or preparing foods.

Section 4. Memorandum of Understanding.

The Mayor of the City of Freeport is hereby authorized and directed to enter into a Memorandum of Understanding with the Illinois Environmental

Protection agency ("Illinois EPA") in which the City of Freeport assumes responsibility for tracking remediated sites, notifying the Illinois EPA of changes to this ordinance, and taking certain precautions when siting public potable water supply wells.

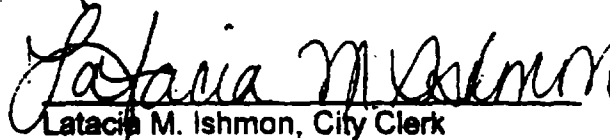
Section 5. This Ordinance shall be effective immediately upon its passage by the City Council, its approval by the Mayor, and its publication as provided by law.

Section 6. This Ordinance is expressly adopted pursuant to the Home Rule Powers of the City of Freeport under Section 6 of Article VII of the Illinois Constitution of 1970.

Section 7. All ordinances or parts of ordinances in conflict with this Ordinance are repealed insofar as they conflict.

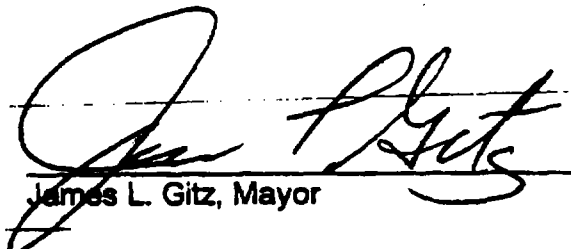
Section 8. If any section, clause or provision of this Ordinance be declared by a Court of competent jurisdiction to be invalid, such decision shall not affect the validity of the Ordinance as a whole or any part thereof, other than the part so declared to be invalid, and this City Council hereby expressly declares that it would have enacted this Ordinance even with the invalid portion deleted.

PASSED BY THE CITY COUNCIL OF THE CITY OF FREEPORT,
ILLINOIS this 15th day of March, 2004.


Latacia M. Ishmon, City Clerk

YEAS: 8
NAYS: 0
ABSTAIN: 0
PRESENT: 8

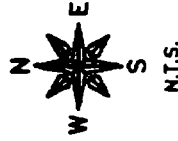
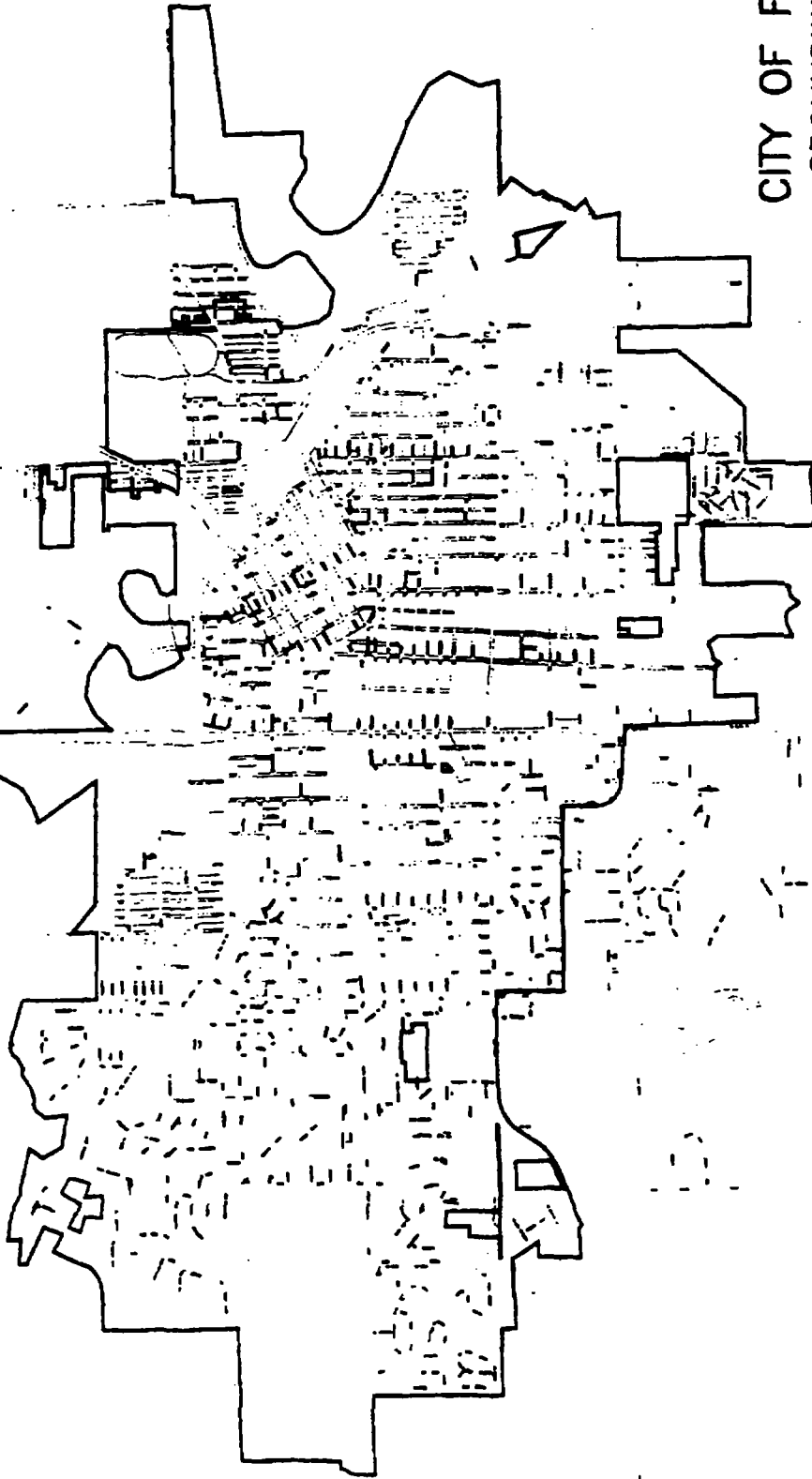
APPROVED by the Mayor of the City of Freeport this 16th day of March, 2004.


James L. Gitz, Mayor

Date Published: 3-15-04
Date Effective: 3-16-04

LEGEND

— GROUNDWATER USE
— ORDINANCE BOUNDARY



CITY OF FREEPORT
GROUNDWATER USE
ORDINANCE MAP

12/08/03

FEHR-GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS

221 E. MAIN ST., SUITE 200 1020 OAKLEY RD. 1107 16TH AVENUE
FREEPORT, ME 01102 ROCKFORD, IL 61112 MONROE, WI 53566
615/238-7843 615/304-1700 608/328-0400

© 2003 FEHR-GRAHAM & ASSOCIATES

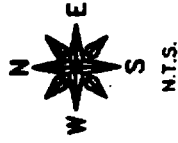
EOLPT/03/43493/43493-Exhibit

ATTACHMENT A

MAP

LEGEND

GROUNDWATER USE
ORDINANCE BOUNDARY



CITY OF FREEPORT
GROUNDWATER USE
ORDINANCE MAP

12/08/03

 **FEHR-GRAHAM & ASSOCIATES**
ENGINEERING AND SCIENCE CONSULTANTS

221 E. MAIN ST., SUITE 200
FREEPORT, N.Y. 11531
915/235-7643

1920 BARCLAY RD.
ROCKVILLE, N.Y. 11112
815/384-4700

1107 16TH AVENUE
ROCKVILLE, N.Y. 11354
800/328-4400

© 2003 FEHR-GRAHAM & ASSOCIATES

EGUPT/03/43493/43493-Exhibit



City of Freeport, Illinois

Sarah M. Griffin, Corporation Counsel

230 W. Stephenson St., Freeport, Illinois 61032

(815) 235-8206 Fax:: (815) 235-8874

August 9, 2004

Marc Cummings
IEPA
Voluntary Site Remediation Unit
PO Box 19276
Springfield, IL 62794-9276

Re: Statement of Authority

Dear Mr. Cummings:

Please be advised that the statement of authority to enter into the Memorandum of Understanding can be found in Section 4 of Freeport Codified Ordinance No. 2004-12.

Sincerely,

Sarah M. Griffin

Attachment C



FEHR-GRAHAM & ASSOCIATES
Engineering and Science Consultants

Civil • Surveying • EHS • Municipal • IT